

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

TONY K. MCDONALD, JOSHUA
B. HAMMER, and MARK S.
PULLIAM,

Plaintiffs,

Case No. 1:19-cv-219-LY

v.

JOE K. LONGLEY, et al. ,

Defendants.

DECLARATION OF SAMUEL D. ADKISSON

1. I am over the age of eighteen and under no mental disability or impairment. I have personal knowledge of the facts stated herein, and if called upon to do so, could and would testify competently thereto.

2. I am an attorney at the law firm Consovoy McCarthy PLLC and counsel for Plaintiffs Tony K. McDonald, Joshua B. Hammer, and Mark S. Pulliam.

3. The following materials filed herewith as exhibits are true and accurate copies of what they purport to be to the best of my personal knowledge.

4. Exhibit A is a webpage titled “State Bar of Texas Dues Schedule” downloaded from the Texas State Bar’s website on March 9, 2019.

5. Exhibit B is a webpage titled “Governmental Relations” and was downloaded from the Texas State Bar’s website on March 9, 2019.

6. Exhibit C is a webpage titled “State Bar of Texas 2019 Legislative Program” and was downloaded from the Texas State Bar’s website on March 9, 2019.

7. Exhibit D is a webpage titled “Enrolling as an Inactive Member” and was downloaded from the Texas State Bar’s website on March 9, 2019.

8. Exhibit E is a PDF titled “State Bar of Texas, Financial Report, May 31, 2017” and was downloaded from the Texas State Bar’s website on March 18, 2019.

9. Exhibit F is a webpage titled “State Bar of Texas Office of Minority Affairs” and was downloaded from the Texas State Bar’s website on March 9, 2019.

10. Exhibit G is a webpage titled “Texas Minority Counsel Program (TMCP)” and was downloaded from the Texas State Bar’s website on March 9, 2019.

11. Exhibit H is a webpage titled “State Bar of Texas Diversity Committees and Sections” and was downloaded from the Texas State Bar’s website on March 9, 2019.

12. Exhibit I is a PDF titled “Sponsorship Opportunities, Texas Minority Counsel Program” and was downloaded from the Texas State Bar’s website on March 23, 2019.

13. Exhibit J is a webpage titled “Friday Update” and was downloaded from the Texas State Bar’s website on March 9, 2019.

14. Exhibit K is a PDF titled “State Bar of Texas 2019-2020 Proposed Combined Budget” and was downloaded from the Texas State Bar’s website on March 9, 2019.

15. Exhibit L is a PDF titled “State Bar of Texas 2018-2019 Proposed Combined Budget” and was downloaded from the Texas State Bar’s website on March 9, 2019.

16. Exhibit M is a webpage titled “Legal Access Division” and was downloaded from the Texas State Bar’s website on March 9, 2019.

17. Exhibit N is a webpage titled “CLE and Events” and was downloaded from the Texas State Bar LGBT Section’s website on March 9, 2019.

18. Exhibit O is a webpage titled “Volunteer and Resource Opportunities” and was downloaded from the Texas State Bar’s website on March 9, 2019.

19. Exhibit P is a webpage titled “State Bar President Joe Longley Offers Update from the Border” and was downloaded from the Texas State Bar’s website on March 9, 2019.

20. Exhibit Q is a PDF titled “State Bar of Texas Annual Meeting, Houston 2018, Event Guide” and was downloaded from the Texas State Bar’s website on March 9, 2019.

21. Exhibit R is a webpage titled “Texas Access to Justice Commission” and was downloaded from the Texas Access to Justice Commission’s website on March 9, 2019.

22. Exhibit S is a webpage titled “Texas Bar Journal” and was downloaded from the Texas State Bar’s website on March 9, 2019.

23. Exhibit T is a PDF titled “What’s That ‘Fleck’ on the Horizon?” and was downloaded from the Texas State Bar’s website on March 9, 2019.

24. Exhibit U is a webpage titled “Dues and Other Fees” and was downloaded from the Texas State Bar’s website on March 9, 2019.

25. Exhibit V is a PDF titled “Membership 2018-2019 Licensing Fees Schedule” and was downloaded from the Texas State Bar’s website on March 9, 2019.

26. Exhibit W is a webpage titled “Expenditure Protest Policy” and was downloaded from the Texas State Bar’s website on March 9, 2019.

27. Exhibit X is a PDF of “S.J.R. No. 9” and was downloaded from the Texas Legislature Online website on March 18, 2019.

28. Exhibit Y is a PDF of “H.B. No. 978” and was downloaded from the Texas Legislature Online website on March 18, 2019.

29. Exhibit Z is a PDF of “H.B. No. 575” and was downloaded from the Texas Legislature Online website on March 24, 2019.

30. Exhibit AA is a PDF of “H.B. No. 2782” and was downloaded from the Texas Legislature Online website on March 24, 2019.

31. Exhibit BB is a PDF of “H.B. No. 553” and was downloaded from the Texas Legislature Online website on March 24, 2019.

32. Exhibit CC is a webpage titled “Home” and was downloaded from the Texas State Bar’s website on March 18, 2019.

33. Exhibit DD is a PDF of a letter sent from Defendants’ attorney Thomas S. Leatherbury to Texas Attorney General Ken Paxton on February 20, 2019.

34. Exhibit EE is a PDF of the “State Bar of Texas Board of Directors Policy Manual, September 2018” and was downloaded from the Texas State Bar’s website on March 21, 2019.

35. Exhibit FF is a webpage titled “Legal Services Fee” and was downloaded from the Texas State Bar’s website on May 29, 2019.

36. Exhibit GG is a PDF titled “State Bar Rules As Amended June 2018” and was downloaded from the Texas State Bar’s website on May 28, 2019.

37. Exhibit HH is a PDF of the May 2019 edition of the *Texas Bar Journal* and was downloaded from the Texas State Bar’s website on May 29, 2019.

38. Exhibit II is a PDF of the June 2018 edition of the *Texas Bar Journal* and was downloaded from the Texas State Bar’s website on May 29, 2019.

39. Exhibit JJ is a webpage showing two tweets sent by Trish McAllister, Executive Director of the Texas Access to Justice Commission. The tweets were sent on May 27 and 28, 2019, and were downloaded from Twitter.com on May 29, 2019.

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Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this day, May 31, 2019.

/s/ Samuel D. Adkisson

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